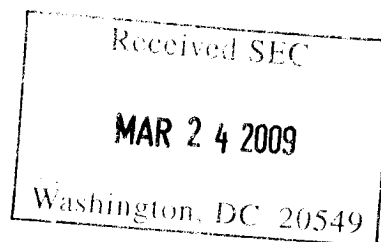


NYSE Regulation

09000984

**VIA FACSIMILE AND U.S. MAIL**

March 24, 2009

Ms. Velma Smith, Branch Chief
Branch of Filer Support 2, Mailstop 1-4
Securities and Exchange Commission
450 Fifth Street, N.W., Room #1004
Washington, D.C. 20549

CERTPAC
001-32544

Re: Citigroup Funding Inc.—Original Listing
CIK: 0001318281
Filer: 001-32544
Filing: 8-A12B 3/24/2009

Dear Ms. Smith:

Please be advised that NYSE Regulation, Inc. has received (on March 18, 2009) an application from the above-referenced issuer and has approved the following securities for listing on NYSE Arca, Inc. ("Exchange"):

3% Minimum Coupon Principal Protected Notes Based Upon the Dow Jones-AIG
Commodity IndexSM-Excess Return Due 2014

The Exchange requests acceleration of registration of this security under the Securities Exchange Act of 1934. If there are any questions, please call me at (312) 442-7832. Your assistance is greatly appreciated.

Sincerely,

Craig A. Gray
Manager, Listing Compliance

Enclosure